

Plaintiff attaches true and correct screen captures of investigator's searches as **Exhibit D** taken in Rolling Meadows, Illinois.

13. The investigator clicked through the advertisement to Defendant's website (www.cerakoteguncoatings.com) where the investigator made a purchase of Defendant's firearms finish product. Plaintiff attaches a true and correct copy of a screen capture of the home page at www.cerakoteguncoatings.com as Exhibit E. Defendant shipped that product to the investigator's offices in Rolling Meadows, Illinois. Plaintiff attaches true and correct copies of the shipping case and shipping bill as Exhibit E.

B. Defendant infringement of DURACOAT® mark and LAUER marks

14. On information and belief, Defendant adopted and used in interstate commerce the DURACOAT mark for firearms finishes and LAUER marks for firearms finishes throughout the United States (including the Northern District of Illinois) after Plaintiff adopted, used in interstate commerce and made famous its DURACOAT mark and its LAUER marks throughout the United States (including the Northern District of Illinois). On information and belief, Defendant bought the adwords DURACOAT and LAUER and LAUER CUSTOM WEAPONRY and directed that Plaintiff's trademarks DURACOAT and LAUER and LAUER CUSTOM WEAPONRY be published in the headlines of adword search results to induce potential customers of Plaintiff's products to Defendant's website. Defendant has usurped Plaintiff's right and its ability to control its reputation and therefore damaged Plaintiff by Defendant's use of Plaintiff's DURACOAT mark and Plaintiff's LAUER marks.